

BURRIS, NISENBAUM, CURRY & LACY LLP
JOHN L. BURRIS, Esq. (SBN 69888)
Airport Corporate Centre
7677 Oakport Street, Suite 1120
Oakland, California 94621
Telephone: (510) 839-5200
Facsimile: (510) 839-3882
john.burris@johnburrislaw.com

BURRIS, NISENBAUM, CURRY & LACY LLP
DEWITT M. LACY, Esq. (SBN 258789)
JULIA N. QUESADA, Esq. (SBN 337872)
LENA P. ANDREWS, Esq. (SBN 342471)
9701 Wilshire Blvd., Suite 1000
Beverly Hills, California 90212
Telephone: (310) 601-7070
Facsimile: (510) 839-3882
dewitt@bnclaw.com
julia.quesada@bnclaw.com
lena.andrews@bnclaw.com

15 Attorneys for Plaintiff
16 Antonio Lopez, Johanna Lopez, & S.L. by and through his guardian ad litem
Rocio Flores

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ANTONIO LOPEZ, individually;
JOHANNA LOPEZ, individually;
M.R., by and through his guardian ad
litem, April Rodriguez, individually
and as successor in interest to
Brandon Lopez; B.L. and J.L., by and
through their guardian ad litem
Rachel Perez, individually and as
successors in interest to Brandon
Lopez; S.L., by and through his
guardian ad litem, Rocio Flores,
individually and as successor in
interest to Brandon Lopez,

Plaintiff.

VS.

Case No.: 8:22-cv-01351-JVS-ADS

*(Honorable James V. Selna; Magistrate
Judge Autumn D. Spaeth)*

**PLAINTIFFS' ADMINISTRATIVE
APPLICATION TO FILE BODY
WORN CAMERA MARKED
CONFIDENTIAL BY FORMER
DEFENDANT CITY OF SANTA
ANA IN SUPPORT OF THEIR
OPPOSITION TO DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT UNDER SEAL**

Case No. 2:22-cv-07651-JLS-KS

**PLAINTIFFS' ADMINISTRATIVE APPLICATION TO FILE BODY WORN CAMERA MARKED
CONFIDENTIAL BY FORMER DEFENDANT CITY OF SANTA ANA IN SUPPORT OF THEIR
OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT UNDER SEAL**

1 CITY OF ANAHEIM, a municipal
 2 corporation; CITY OF SANTA
 3 ANA, a municipal corporation;
 4 DAVID VALENTIN, individually
 5 and in his official capacity as the
 6 Chief of Police for the CITY OF
 7 SANTA ANA Police Department;
 8 JORGE CISNEROS, individually
 9 and in his official capacity as the
 10 Chief of Police for the CITY OF
 11 ANAHEIM Police Department;
 12 PAUL DELGADO, individually and
 13 in his official capacity as an officer
 14 for the CITY OF ANAHEIM Police
 15 Department; BRETT HEITMAN;
 16 KENNETH WEBER, individually
 17 and in his official capacity as an
 18 officer for the CITY OF ANAHEIM
 19 Police Department; BRETT
 20 HEITMAN; CAITLIN PANOV,
 21 individually and in her official
 22 capacity as an officer for the CITY
 23 OF ANAHEIM Police Department;
 24 BRETT HEITMAN, individually and
 25 in his official capacity as an officer
 26 for the CITY OF ANAHEIM Police
 27 Department and CITY OF
 SANTA ANA Police Department,

Defendants.

Pursuant to Local Rule 79-5.2.2, Plaintiffs ANTONIO LOPEZ (hereinafter “Mr. Lopez”) and JOHANNA LOPEZ (hereinafter “Ms. Lopez”) (“Plaintiffs”) hereby submit their Administrative Application to File Exhibits Marked Confidential by Defendants in Support of Their Opposition to Defendants’ Motion for Summary Judgment Under Seal. The full documents, attached as Exhibits to the Declaration of Lena P. Andrews in Support of Plaintiffs’ Administrative Application to File Exhibits in Support of Their Opposition to Defendants’ Motion for Summary Judgement Under Seal, are proposed to be filed under seal.

1 Pursuant to Local Rule 79-5.2.2(b), Plaintiffs make this application on the
2 grounds that: Plaintiffs rely on the Body Worn Camera Video of SAPD Officer Arias
3 (Exhibit L) in support of their Opposition to Defendants Motion for Summary
4 Judgment. Exhibit L was produced and marked confidential by former Defendant
5 City of Santa Ana, who is no longer a party to this action.

6 The parties met and conferred via email on July 22, 2024, regarding the video.
7 The parties were unable to reach an agreement regarding whether the document
8 could be filed publicly.

9 Accordingly, Plaintiffs respectfully request this Court enter an order
10 permitting the Body Worn Camera Video of SAPD Officer Arias (Exhibit L), to be
11 filed under seal in support of Plaintiff's Opposition to Defendants' Motion for
12 Summary Judgment. In the alternative, Plaintiffs respectfully request this Court deny
13 this application and enter an Order permitting Plaintiffs to file the Body Worn
14 Camera Video of SAPD Officer Arias (Exhibit L) publicly.

15 Dated: July 22, 2024

BURRIS, NISENBAUM, CURRY & LACY LLP

17 By: /s/ Lena Andrews

18 DeWITT M. LACY

19 JOHN L. BURRIS

20 JULIA N. QUESADA

21 LENA P. ANDREWS

22 Attorneys for Plaintiffs Antonio
Lopez, Johanna Lopez, & S.L. by
and through his guardian ad litem
Rocio Flores